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RCOM SECTION

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Steelcote Mfg Co.Address: 3418 Gratiot StSt. Louis MO 63103EPA ID Number: MO0006275036Date: 3-6-91

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
1) 40 CFR 265.14 (a)	- Failure to prevent unknown entry to still area
2) 10 CSR 25.262(2)(C)(2)O	- "No Smoking" signs not appropriately installed
3) 40 CFR 265.173 (a)	- open containers
4) 40 CFR 265.35	- Inadequate aisle space
5) 10 CSR 25.512.62(2)(C) 2, B	- Containers not protected from accumulated liquid
6) 40 CFR 265.176	- Ignitable waste stored < 50 ft from property line
7) 40 CFR 262.34 (C)	- Over 55 gal stored at satellite accumulation pt
8) 40 CFR 265.32	- One 55-gal container stored over 1 yr.
9) 40 CFR 262.11	- Inadequate fire & spill control equipment and water supply
10) 40 CFR 262.34	- Failure to make hazardous waste determination
11) 40 CFR 265.1050 Subpart B	- Storage of hazardous waste over 90 days & failure to comply with the requirements for interim status or a permit
12) 40 CFR 265.31	- Failure to comply with the Air Emissions stds for equipment leaks
	- Facility not operated to minimize the possibility of an emergency

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Steelcote Mfg Co is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Michael Sanderson, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Steelcote will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Cynthia Hutchinson (U. S. EPA) at (913) 551-7051, or _____, at _____.

This Notice prepared by Krista C GombDate: 3-6-91

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: JAMES S. MOOREDate: 3-6-91Signature: James S. MooreTitle: PLANT MANAGER

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RCRA RECORDS CENTER